

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA,)	
)	
<i>Plaintiff,</i>)	
)	Civil Action No.1:03-CV-00434 (HHK)
v.)	
)	
SMITHFIELD FOODS, INC.,)	
)	
<i>Defendant.</i>)	
)	

UNCONTESTED MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER

Plaintiff, United States of America (“United States”), respectfully moves this Court, pursuant to Fed. R. Civ. P. 7(b) and 26(c), for entry of the attached Stipulated Protective Order limiting the use and disposition of information and documents. Jurisdictional discovery in this action is expected to yield documents and information of a sensitive and confidential nature, including business, commercial, financial, and trade secret information of the Defendant, Smithfield Foods, Inc. (“Smithfield”), its subsidiaries, and third parties to this action. Further, some of the documents and information submitted by Smithfield or any third parties, whether pursuant to compulsory process or voluntarily, in the course of the United States’s pre-complaint investigation may also contain sensitive and confidential information. As a result, the United States and Smithfield have agreed to the attached Stipulated Protective Order and request that the Court enter it in this case.

Statement of Compliance with LCvR 7.1 (m)

Pursuant to LCvR 7.1(m), Plaintiff discussed this motion with Smithfield’s counsel by

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**PLAINTIFF’S STATEMENT OF POINTS AND AUTHORITIES IN SUPPORT OF ITS
UNCONTESTED MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Plaintiff’s Uncontested Motion for Entry of Stipulated Protective Order is made pursuant to Rules 7(b) and 26(c)(7) of the Fed. R. Civ. P., as well as Rule 7.1 of the LCvR.

Plaintiff respectfully requests that the Court enter the attached Stipulated Protective Order to ensure that confidential information obtained in jurisdictional discovery in this action, or submitted by Defendant or any third parties, whether pursuant to compulsory process or

voluntarily, in the course of Plaintiff's pre-complaint investigation, is not improperly disclosed.

Dated this 12th day of June, 2003

Respectfully submitted,
Plaintiff, United States

By "/s/"
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